

MEMO ENDORSED

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Licensed to practice law in NY, NJ and D.C.

April 10, 2023

U.S.D.J. Valerie Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re. Luis Toro v. GFM Licensing Group, LLC, Index No. 1:22-cv-10616

Dear Judge Caproni:

My firm was just retained today to represent the Defendant GFM Licensing, LLC (the “Defendant”) in the above referenced matter. Pursuant to Rule 2(C) of this Honorable Court’s Individual Practices in Civil Cases, Defendant writes to request an adjournment of the initial pretrial conference scheduled for April 14, 2023 at 10:00 am. We are also requesting an extension of the deadline to meet and confer with Plaintiff’s counsel and to file a joint letter, both of which passed before my office was retained in this matter. Therefore, Defendant requests that the initial pretrial conference be adjourned for 30-days, including all associated deadlines.

The reason for our request is so that my office may review the allegations for purposes of potentially coming to an amicable resolution of this matter. Plaintiff’s counsel consents to our request, as it is Defendant’s first request for an adjournment or extension of any conferences or deadlines. Defendant’s requests for the above-referenced adjournment and extensions do not affect any other deadlines or dates.

We thank you for your time and attention to our request.

Respectfully submitted,

Bashian & Papantoniou, P.C.

/s/ Erik M. Bashian
Erik M. Bashian

cc: All counsel of record (*via ECF only*)

Application GRANTED. The Initial Pre-Trial Conference scheduled for Friday, April 14, 2023 at 10:00 A.M. is hereby adjourned until **Friday, May 19, 2023 at 10:00 A.M.** The parties must meet and confer for at least one hour in a good-faith attempt to settle this case not later than **Friday, May 5, 2023**. The parties' joint letter and proposed case management plan as set forth at Dkt. 5 is due not later than **Thursday, May 11, 2023**. Defendant's deadline to answer or otherwise respond to the Complaint is **Friday, May 19, 2023**.

SO ORDERED.


04/10/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE